

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TENNESSEE
CHATTANOOGA DIVISION

STACY STROBL and BRIAN HARDING,)	
On behalf of themselves and all others)	
Similarly situated,)	
)	
Plaintiffs,)	
)	Case No. 1:24-cv-00140-CLC-CHS
vs.)	
)	JURY DEMAND
PAUL CROFT; JONATHAN FROST;)	
RHINO ONWARD INTERNATIONAL, LLC;)	
ROI FUND I, LLC; ROI FUND II, LLC;)	
ROI FUND III, LLC; ROI FUND IV, LLC;)	
BRIAN KAWAMURA; CROFT & FROST, PLLC;)	
THE WELL FUND LLC; SCORPIO REF, LLC;)	
MATTHEW DIRA; THE DIRA GROUP;)	
CHESTNUT HOLDINGS, LLC; STEVEN FROST;)	
LISA FROST; JOSEPH INVESTMENTS, LLC;)	
JANE and JOHN DOES 1-25,)	
)	
Defendants.)	

**THE WELL FUND, LLC’S MOTION FOR AN EXTENSION OF TIME
WITHIN WHICH TO FILE RESPONSIVE PLEADINGS**

Comes now The Well Fund, LLC (“The Well Fund”), a defendant in the above matter, by and through counsel, pursuant to Local Rule 12.1, and respectfully moves this Honorable Court for the entry of an order extending the time within which The Well Fund has to file responsive pleadings in this case until July 26, 2024.

In support of this motion, the undersigned parties aver as follows:

1. Counsel have previously extended the deadline to July 16, 2024, for purposes of meeting to confer pursuant to the Court’s Standing Order addressing Motions pursuant to Rule 12 of the Federal Rules of Civil Procedure.

2. Counsel for The Well Fund and counsel for Plaintiffs conferred via telephone on or about July 9, 2024.
3. Due to scheduling difficulties outside of counsel's control, Counsel for the Well Fund and counsel for Plaintiffs, subject to this Court's approval, have agreed to propose the date of July 26, 2024, for responsive pleadings to be filed by The Well Fund.

For the foregoing reasons, The Well Fund respectfully moves this Honorable Court for the entry of an order extending the time in which The Well Fund may file responsive pleadings filed in this case until July 26, 2024.

Respectfully submitted this 15th day of July
2024.

s/ J. Michael Holloway

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CERTIFICATE OF SERVICE

I hereby certify that on this this 15th day of July, 2024, the foregoing was filed electronically with the Clerk of Court to be served by operations of the Court's electronic filing system upon the following:

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